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Attorneys for Defendants
Cohen Dowd Quigley P.C.,
Ronald J. Cohen, Betsy Lamm,
Daniel Quigley, and Jenna Brownlee

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FRESH MIX, LLC

Plaintiff,

v.

PISANELLI BICE, PLLC, a Nevada Law Firm
 and Professional Limited Liability Company,
 JAMES P. PISANELLI, ESQUIRE, an
 individual, DEBRA L. SPINELLI, ESQUIRE,
 an individual, AVA SCHAEFER, ESQUIRE,
 an individual, COHEN DOWD QUIGLEY PC,
 an Arizona Law Firm and Professional
 Corporation, RONALD J. COHEN, an
 individual, BETSY LAMM, an individual,
 DANIEL QUIGLEY, an individual, JENNA
 BROWNLEE, an individual, BRUCE A.
 LESLIE, CHTD, A Nevada Firm, BRUCE A.
 LESLIE, an individual; BROWNSTEIN
 HYATT FARBER SCHRECK LLP; a
 Colorado Limited Liability Partnership;
 SAMUEL A. SCHWARTZ, an individual, and
 SCHWARTZ LAW, PLLC, and
 ZACHARIAH LARSON, an individual , and
 LARSON & ZIRZOW, LLC

Defendants.

Case No.: 2:24-cv-00397 JCM-NJK

**STIPULATION AND ORDER
 EXTENDING TIME TO FILE REPLY
 IN SUPPORT OF DEFENDANTS
 COHEN DOWD QUIGLEY P.C.,
 RONALD J. COHEN, BETSY LAMM,
 DANIEL QUIGLEY, AND JENNA
 BROWNLEE’S MOTION TO
 DISMISS PLAINTIFF FRESH MIX’S
 AMENDED COMPLAINT
 PURSUANT TO FED. R. CIV. P. 12
 (ECF NO. 51)**

(First Request)

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Pursuant to Local Rules IA 6-1 and 6-2 and 7-1, IT IS HEREBY STIPULATED AND AGREED between Plaintiff Fresh Mix, LLC and Defendants Cohen Dowd Quigley P.C., Ronald J. Cohen, Betsy Lamm, Daniel Quigley, and Jenna Brownlee (collectively, the “CDQ Defendants”), by and through the undersigned counsel of record, that the CDQ Defendants shall have additional time to file their Reply in Support of their Motion to Dismiss Fresh Mix’s First Amended Complaint Pursuant to Fed. R. Civ. P. 12. The CDQ Defendant’s Motion to Dismiss (ECF No. 51) was filed on May 3, 2024 and Plaintiff’s Opposition (ECF No. 73) was filed on May 17, 2024. The original deadline for the CDQ Defendants’ Reply, which is May 24, 2024, is hereby extended to June 3, 2024.

Good cause exists for this extension. The CDQ Defendants require additional time to prepare a Reply in Support of their Motion to Dismiss as the undersigned counsel for the CDQ Defendants will be in depositions every day for the next week-and-a-half for an unrelated Nevada state court case.

This is the first stipulation for an extension of time to file this Reply. This Stipulation is not made for purposes of delay.

DATED this 21st day of May, 2024.

KEMP JONES, LLP

/s/ Nathanael Rulis
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STERN & EISENBERG, PC

/s/ Matthew Sharp
Steven K. Eisenberg, Esq.
Admitted Pro Hac Vice

MATTHEW L. SHARP LTD.
Matthew L. Sharp, Esq.
Nevada Bar No. 004746
Attorneys for Plaintiff
Fresh Mix, LLC

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: May 22, 2024